

EXHIBIT 4

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RE: In re: McCRAY, RICHARDSON,
SANTANA, WISE
and SALAAM Litigation,

Docket No. 03 CV 9685 (DAB) (RLE)

99 Park Avenue
New York, New York
April 23, 2013
10:06 a.m.

EXAMINATION BEFORE TRIAL of LINDA
FAIRSTEIN, a Defendant in the
above-entitled action, held at the above
time and place, taken before Alice
Schulman, a Notary Public of the State of
New York, pursuant to Notice and
stipulations between Counsel.

* * *

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NYCLD_038869

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25 KAITLIN F. NARES, INTERN

1	A. In the preparation with	11:04:41
2	detectives for the trial of the case. So	11:04:43
3	she did not have to come to me to get	11:04:45
4	permission to assign detectives for daily	11:04:48
5	work with her.	11:04:52

6 Q. Were you involved in assisting 11:04:53
7 Ms. Lederer and/or Mr. Clements in any way 11:04:56
8 in the preparation for the trials and the 11:05:02
9 prosecutions themselves? 11:05:06

10 A. In some respects, yes. 11:05:10

11 Q. In what respects? 11:05:14

12 A. If Ms. Lederer wanted to discuss 11:05:16
13 an issue with me or a matter with me, she 11:05:21
14 would call me and we met. 11:05:24

15	I don't believe I ever met with	11:05:27
16	Mr. Clements in the preparation of the	11:05:29
17	case for trial. That's a strong statement	11:05:31
18	ever. I don't recall meeting with Mr.	11:05:33
19	Clements during the preparation for either	11:05:37
20	trial.	11:05:41

21	Q. Can you tell us who the lawyers	11:05:41
22	were who were involved in the team that	11:05:45
23	prosecuted the defendants outside of	11:05:49
24	Lederer and Clements?	11:05:52

25 A. Okay. Yes. The layers of 11:05:53

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1 supervision included Ms. Lederer's three 11:06:03
2 Trial Bureau 40 supervisors. 11:06:07

3 Q. Who? 11:06:09

4 A. John Hogan was the bureau chief 11:06:10
5 in Trial Bureau 40. And also a former 11:06:13
6 member of the Sex Crimes Prosecution Unit. 11:06:18
7 Dan McNulty was, I believe, charged with 11:06:22
8 much of the supervision direct on a daily 11:06:28
9 basis for Ms. Lederer and Mr. McNulty. He 11:06:32
10 was their Deputy Bureau Chief in Trial 11:06:36
11 Bureau 40. I believe the Second Deputy 11:06:41
12 was Mr. Cronin, Steve Cronin. 11:06:43

13 Q. Can you spell that? 11:06:45

14 A. C-R-O-N-I-N. 11:06:45

15 Q. Go on. 11:06:48

16 A. And then I was, in the sense of 11:06:49
17 the sex crimes work, a supervisor. The 11:06:59
18 chief of the Trial Division to whom I 11:07:02
19 reported was also in the supervisory role 11:07:04
20 in this case. 11:07:09

21 Q. Who was that? 11:07:10

22 A. It was at first John Fried when 11:07:11
23 the case was assigned in April 1989. He 11:07:16
24 left the office, a date you can ascertain 11:07:22
25 but probably 1990, replaced by Nancy Ryan 11:07:28

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1 who was then a supervisor. 11:07:32

2 And then up the chain of 11:07:37

3 command, the Chief Assistant District 11:07:39

4 Attorney and Mr. Morgenthau himself. 11:07:41

5 Q. Did you ever talk to Mr. 11:07:44

6 Morgenthau during the period this case was 11:07:47

7 pending before the convictions about 11:07:49

8 anything having to do with the charges, 11:07:51

9 the indictments and the prosecution? 11:07:56

10 MS. DAITZ: Objection to form. 11:07:58

11 A. Did I ever speak? 11:08:00

12 Q. In that period of time. 11:08:03

13 A. In the period of time from April 11:08:05

14 20, 1989 -- 11:08:07

15 Q. Right. 11:08:09

16 A. -- to the convictions? 11:08:09

17 Q. Right. 11:08:11

18 A. Frequently. 11:08:12

19 Q. Did you talk about issues in the 11:08:13

20 case with him? 11:08:15

21 A. Yes, I did. 11:08:16

22 Q. How often? 11:08:17

23 A. Well, in what period of time? 11:08:18

24 Q. In that period of time. 11:08:22

25 A. It varied from the morning of 11:08:24

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1 April 20th for a month or six weeks, he 11:08:28
2 called me into him several times a day 11:08:34
3 every day. There were periods where we 11:08:37
4 didn't speak as frequently. 11:08:43

5 He asked me, I was the person 11:08:47
6 who he called in this particular case. He 11:08:50
7 expected me to give him information from 11:08:55
8 Ms. Lederer and her team that were updates 11:08:58
9 of any kind. So I saw him during that 11:09:01
10 period. And more frequently during the 11:09:05
11 hearings of the case and the trial. 11:09:09

12 Q. If I can remember correctly, in 11:09:13
13 your answer, maybe an answer or so ago, 11:09:23
14 you said something about your assisting in 11:09:26
15 the sex crime aspects of the prosecution. 11:09:28
16 What did you mean by that? 11:09:32

17 A. As you are well aware, there 11:09:33
18 were many charges in this case. And in 11:09:38
19 addition to the five plaintiffs in this 11:09:43
20 case, there were many offenders charged 11:09:44
21 with acts not related to a sexual assault 11:09:50
22 but to physical assaults and to riot, and 11:09:55
23 many of them ultimately to be charged in 11:09:58
24 Juvenile Court. 11:10:01

25 And for all of those issues, Ms. 11:10:04

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